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September 25, 2024

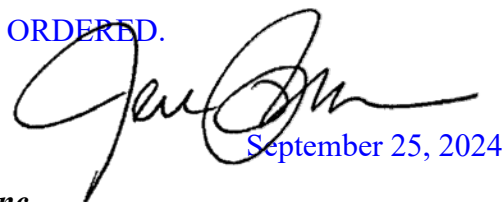
FHM Ref. 102-24/MF

**Via ECF**

Honorable Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

In light of this letter, Hapag's motion to dismiss the Third-Party Complaint is hereby DENIED as withdrawn. The Clerk of Court is directed to terminate ECF No. 36.

SO ORDERED.



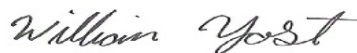
September 25, 2024

**Re: *Liberty Mut. Ins. Co. v. Kuehne + Nagel Inc.*  
*v. Hapag-Lloyd Aktiengesellschaft*  
Case No. 1:23-cv-10511-JMF**

Dear Judge Furman:

We represent third-party defendant Hapag-Lloyd Aktiengesellschaft ("Hapag") in the above referenced matter, and write concerning our Motion to Dismiss the Third-Party Complaint for *forum non-conveniens*. We are in receipt of the Court's Order of September 25, 2024 extending our deadline to submit a reply until September 26, 2024, and we greatly appreciate this courtesy extended by the Court. Nevertheless, we respectfully request that Hapag's pending Motion be withdrawn without prejudice. We thank the Court for its time and consideration of this request.

Respectfully submitted,  
FREEHILL HOGAN & MAHAR LLP



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cc: **Via ECF**

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